

## Algoe-Eakin, Amy

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**Subject:** pre-call: discuss Sen. McCaskill's request for info on Franklin County, MO SO2 NAAQS nonattainment designation  
**Location:** 866-299-3188, code 5642188#  
**Start:** Mon 3/7/2016 11:30 AM  
**End:** Mon 3/7/2016 12:00 PM  
**Recurrence:** (none)  
**Meeting Status:** Accepted  
**Organizer:** Davis, Matthew  
**Required Attendees:** Mathias, Scott; Hemby, James; Jay, Michael  
**Optional Attendees:** Terry, Sara; Ashley, Jackie; Jones, Rhea; Wayland, Richard; Algoe-Eakin, Amy; Peter, David; Weber, Rebecca

Draft agenda [AND WHO MIGHT SPEAK ABOUT IT]:

- a little background on the process of the SO2 designation generally, where we are at now, then maybe a little bit about why this is a different [SCOTT]

- why non-attainment in EPA's judgement. Walk through high-level points from technical support document. [SCOTT AND AMY]

- Modeling vs. Monitoring: EPA received state-run (demonstrates non-attainment), source-run (didn't meet criteria, weren't approved), and Sierra Club-run modeling (6-8 runs). On the air monitors: they are not following EPA guidance, not sure that they're quite in the best location (EPA wasn't asked for input on location), not part of the network, and don't have 3 years of data) [SCOTT. BECKY. CHET.]

- What would it take (high-level) to move from nonattainment to unclassifiable or attainment: approved modeling protocol in the next 120 days, or scenario where all of EPA information points in different directions and are credible (or if we can't rely on it all, can't really say how it) [SCOTT]

Background email for the call:

OCIR HQ got a request from Sen. McCaskill's DC office for a phone call to discuss the SO2 designation for Franklin County, MO. I believe the public comment period is currently open on EPA's proposed decision to classify Franklin County as non-attainment, as opposed to following the state proposed designation as unclassifiable. The staffer would like to hear about EPA's reasoning around the designation and why we relied on modeling instead of the (new?) air monitors in the area to make the designation. I believe the state looked to the monitors in making their unclassifiable recommendation.

He'd be interested in having a call late this week or early next week. Let me know who you think would be best to have on the line and I can coordinate with them about the timing.

Thanks,  
Matthew

Some background that the staffer has perhaps seen or been pointed to by constituent groups:

<http://news.stlpublicradio.org/post/preliminary-epa-designation-says-labadie-coal-plant-exceeds-federal-pollution-standard>

[https://www3.epa.gov/airquality/sulfurdioxide/designations/round2/07\\_MO\\_resp.pdf](https://www3.epa.gov/airquality/sulfurdioxide/designations/round2/07_MO_resp.pdf)

<http://news.stlpublicradio.org/post/missouri-regulators-unable-say-whether-air-near-amerens-labadie-power-plant-safe-breathe>

Summary excerpt from the MO submission to EPA on 9/24/2015:

### Ameren Labadie Energy Center

For the area surrounding the Ameren Labadie Energy Center, the Air Program recommends an unclassifiable area designation. Our recommendation is based on varying modeling results showing both violations and no violations of the SO<sub>2</sub> standard around Labadie, depending on the options and inputs chosen. In addition to these modeling evaluations of Labadie, preliminary data from new ambient SO<sub>2</sub> monitors near the plant is available. Since the start of operation in April 2015, these monitors have been measuring SO<sub>2</sub> concentrations below the 1-hour SO<sub>2</sub> standard of

75 ppb. A new state statute, Section 643.650, RSMo, (SB 445 and HB 92 from the 2015 legislative session), became effective August 28, 2015. Section 643.650, RSMo, directs the department to consider SO<sub>2</sub> monitoring data for sources that choose to monitor to characterize their air quality. Though the dataset from Labadie's new SO<sub>2</sub> monitors is limited, we must consider it, consistent with state law. Because it cannot be determined based on available information whether the area is or is not meeting the 1-hour SO<sub>2</sub> standard, the Air Program recommends an unclassifiable designation for the area near Labadie. In addition to the Air Program's modeling evaluation and review of available SO<sub>2</sub> monitoring data, we are including modeling analyses from Ameren Missouri and Washington University Environmental Law Clinic that we received during the public comment period as further support for the unclassifiable designation around Labadie. These analyses are in Appendix G.